

CALIFORNIA FARM BUREAU FEDERATION

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	FAY - (016) 446-1201



California Farm Bureau Federation

GOVERNMENTAL AFFAIRS DIVISION
1127-11TH STREET SUITE 626. SACRAMENTO, CA 95814 - PHONE (916) 446-4647

November 5, 2004

Polly Lowry
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova CA 95670

Re:

Preliminary Comments on Administrative Draft NPDES General Permit and WDR for Existing Milk Cow Dairies

Dear Ms. Lowry:

The California Farm Bureau Federation appreciates the opportunity to offer the following initial comments on the staff's September 28, 2004 administrative draft NPDES General Permit and WDR for Existing Milk Cow Dairies, pursuant to the Board's September 28, 2004 Notice. It is understood that pursuant to the Board's notice, these comments will be included in the prehearing package for the Board's consideration prior to the scheduled December 2-3, 2004 Board Hearing, at which the staff will provide an information report to the Board on the Administrative Draft. Farm Bureau presently plans to submit further technical and legal comments prior to the December hearing, and looks forward to addressing its concerns to the Board prior to and/or at the December hearing.

Farm Bureau generally concurs and joins in the written comments submitted by the California Dairy Quality Assurance Program on or about this date. There are many specific issues raised in the Administrative Draft, on which Farm Bureau will comment in writing prior to the December Board hearing. However, with these initial comments we wish to simply state that the single most important step that the Regional Board can make in arriving at an effective, stable, and feasible regulatory program for those dairies which require permitting is to immediately involve the staff of the CDQAP in this process.

Very Truly Yours,

Anthony L. François

Director, Water Resources

c: Dr. Michael Payne, CDQAP Manager

bcc: George Gomes, Administrator, CFBF
John Hewitt, CFBF Watershed Specialist
CFBF Field Representatives
Central Valley County Farm Bureaus